



POSSIBLE EXCESSIVE/SUSPICIOUS ORDER REVIEW

Policies and Procedures

Policy Number: **CSRA 2.12**
Written/revised by: Steve Mays

Effective: December 1, 2005
Revised:

PURPOSE

To ensure compliance with applicable state and federal regulations, AmerisourceBergen Corporation (ABC) has designed this program to review the ordering activity of its customers to identify the existence of possible excessive or suspicious orders of controlled substances and listed chemical products.

POLICY

The CSRA department and Distribution Center Management will be responsible for identifying potential excessive or suspicious customer ordering activity of controlled substances and/or listed chemical products and will initiate appropriate investigative steps when possible indicators of such activity are identified. As part of this effort, all ABC Associates are expected to report to the CSRA department any information regarding potential excessive or suspicious orders of controlled substances and/or listed chemical products by any ABC customer.

OVERVIEW OF PROCEDURE

Investigations into possible excessive/suspicious orders may be initiated through the following three sources:

- A. Possible Excessive / Suspicious Order Monitoring Program
- B. Notification by DEA
- C. Notification by Distribution Center

A. Possible Excessive / Suspicious Order Monitoring Program

The following procedures will be conducted as part of the Suspicious / Excessive Order Monitoring Program:

1. The CSRA department will establish appropriate guidelines and parameters of monthly ordering activity for certain controlled substances and listed chemical products.
2. At the beginning of each month, the CSRA department will generate a "Possible Excessive / Suspicious Order Report" to identify ABC customers whose ordering

PLAINTIFFS TRIAL
EXHIBIT
P-26293_00001

activity for the preceding month are in excess of the guidelines and parameters of monthly ordering activity established by the CSRA department. This report will be reviewed by a CSRA Specialist and the CSRA Manager.

3. The CSRA Manager will identify customers whose purchasing activity warrants further review.
4. A one year purchase history for controlled substances and listed chemical products will be reviewed by the CSRA manager for each customer identified in step #3.
5. The CSRA Manager will consult with the appropriate DC and account manager regarding the customer's ordering patterns. If the CSRA Manager determines that further investigation is appropriate, additional investigative steps will include:
 - a. Obtaining all agreements and contracts the customer has with ABC;
 - b. Obtaining a copy of the customer's file ; and
 - c. Utilizing ABC's "Pharmacy Questionnaire (CSRA I Form 590), the responsible account manager for the customer will conduct a site visit of the customer and return the completed CSRA I Form 590 to the CSRA Manager within one (1) week.
6. The CSRA Manager will conduct a final review with the CSRA Director after all relevant information has been obtained in order for the CSRA Director to determine the appropriate resolution of the investigation, which, following consultation with the Legal Department, may include immediate cessation of sales of controlled substances and/or listed chemical products to the customer.
7. If sales of controlled substances and/or listed chemicals to the customer are to be continued, such sales will be conditioned upon the customer signing one of the following documents:
 - a. Non-Internet Pharmacy Agreement (CSRA I Form 590a)
 - b. Internet Pharmacy Compliance Agreement (CSRA I Form 590b)

Non-Internet Pharmacy Agreement

If the customer does not participate in an internet pharmacy operation, an authorized customer representative will be required to sign a Non-Internet Pharmacy Agreement (CRSA I Form 590a).

Internet Pharmacy Compliance Agreement

If the customer participates in an internet pharmacy in which controlled substances are dispensed, an authorized customer representative will be required to sign an Internet Pharmacy Compliance Agreement (CSRA I Form 590b).

8. If the customer signs the applicable agreement, the signed agreement will be maintained in the matter file and the account will remain open and be closely monitored.

9, If the customer declines to sign the applicable agreement, CSRA will contact the VP / DC Manager of the appropriate ABC distribution center and the Legal Department and request that the customer's ability to purchase controlled substances and listed chemical products be suspended immediately and indefinitely.

B. Notification by DEA

If ABC receives notice from the DEA of possibly excessive or suspicious purchasing activity, CSRA will follow Steps 4 through 9 described above. DEA will also be notified upon completion of the investigation and will be advised of the disposition of the account.

C. Notification by Distribution Center

If an ABC Distribution Center receives notice of possibly excessive or suspicious Purchasing activity, CSRA will follow Steps 4 through 9 described above.